IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Beverly Jean Tyler aka Beverly Jean Tyler-Coleman Debtor	Chapter: 13 Bankruptcy Case: 15-12776-ELF
Carisbrook Asset Holding Trust Creditor/Movant v.	
Beverly Jean Tyler aka Beverly Jean Tyler-Coleman Respondent	
ORDER APPROVING STIPULATION/CONSENT ORDER	
AND NOW, this day of	, 2019, upon consideration of the
Stipulation between Debtor and Carisbrook Asset Holding Trust, it is hereby	
ORDERED and DECREED that the Stipulation	is APPROVED and made an Order of the Court;
and it is	
FURTHER ORDERED and DECREED that Mo	ovant (and any assignee/successor-in-interest),
pursuant to the terms of the Stipulation, may proceed with enforcement of all rights Movant has under	
state and federal law concerning the property located at 633 Highland Ave, Jenkintown, PA 19046; and it	
is	
FURTHER ORDERED and DECREED that the automatic stay under 11 USC §362 is not in	
effect as to the Property only.	
BY THE COURT:	
UNITE	ED STATES BANKRUPTCY JUDGE

STERN & EISENBERG, PC 1581 MAIN STREET, SUITE 200 THE SHOPS AT VALLEY SQUARE WARRINGTON, PA 18976 TELEPHONE: (215) 572-8111 FACSIMILE: (215) 572-5025

(COUNSEL FOR MOVANT)

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: Beverly Jean Tyler aka Beverly Jean Tyler-Coleman Debtor	Chapter: 13
Carisbrook Asset Holding Trust Creditor/Movant	Bankruptcy Case: 15-12776-ELF
v. Beverly Jean Tyler aka Beverly Jean Tyler-Coleman Respondent	

CONSENT ORDER/STIPULATION SETTLING MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, this ______ day of _______, 2019, upon the Motion of Carisbrook Asset Holding Trust, or its successor in interest (hereinafter "Creditor"), through its Counsel, Stern & Eisenberg PC, under 11 U.S.C. § 362(d) (and § 1301) for relief from the automatic stay as to Debtor's real property located at 633 Highland Ave, Jenkintown, PA 19046 (hereinafter, the "Property"), and the parties agreeing to the entry of the Order settling the Motion for Relief and for cause shown, it is hereby ORDERED AND DECREED as follows:

- 1. On November 6, 2009, Beverly Jean Tyler ("Debtor") signed a Note and Mortgage Agreement in the principal sum of \$308,327.00 evidencing a loan from Bank of America, N.A. in the same amount, secured by the real property located at 633 Highland Ave, Jenkintown, PA 19046 (hereinafter, the "Property") evidenced by the mortgage recorded with the Montgomery County Recorder of Deeds as Doc ID: 2009120792 (the "Mortgage").
- 2. Debtor filed the instant bankruptcy action on April 22, 2015.
- 3. On July 29, 2019, Creditor filed a Motion for Relief pursuant to 11 U.S.C. § 362(d) (and § 1301), and Debtor filed a response thereto on August 08, 2019.
- 4. Debtor now agrees that the automatic stay provision pursuant to 11 USC §362 is not in effect as to the Property only.
- 5. In exchange from immediate relief from the automatic stay, Creditor agrees to a 90-day moratorium on any state foreclosure proceedings against Debtor or the Property from the date this Stipulation is entered on the docket.
- 6. Facsimile signatures shall be as valid as original signatures and this Consent Order/Stipulation may

be signed in counterparts.

By signing this Stipulation/Consent Order, Debtor's Counsel represents that Debtor is familiar with and understand the terms of the Stipulation/Consent Order and agree to said terms regardless of whether Debtor has actually signed said stipulation. Seen and agreed by the parties on the date set forth below:

/s/Daniel P. Jones, Esq.

Daniel P. Jones, Esq.

Stern & Eisenberg, PC

1581 Main Street, Suite 200

The Shops at Valley Square

Warrington, PA 18976

Telephone: (215) 572-8111

Email: djones@sterneisenberg.com

Counsel for Creditor

Date: September 25, 2019

Clair M. Stewart

100 S. Broad Street

Suite 1523

Philadelphia, PA 19110 Telephone: 215-564-5150

clairstewart@cstewartlaw.com

Counsel for Debtor(s)

Date

William C. Miller, Esq.

P.O. Box 1229

Philadelphia, PA 19105

Telephone 215-627-1377

Fax: 215-627-6299

Email: elf@ph13trustee.com

Date:

NO OBJECTION

*without prejudice to any trustee rights and remedies.